

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO**

In re:)	Case No. 19-40267-jpg
)	
California Palms, LLC,)	
)	Chapter 11
Debtor.)	
)	
)	Judge John P. Gustafson
)	
)	

**MOTION OF PENDER CAPITAL ASSET BASED LENDING FUND I, L.P. TO
CONTINUE THE APRIL 15, 2019 HEARINGS ON STATUS CONFERENCE [DOC. NO.
13] AND ITS MOTION OF PENDER CAPITAL ASSET BASED LENDING FUND I, L.P.
(A) TO DISMISS THIS CHAPTER 11 PROCEEDING FOR CAUSE; OR, IN THE
ALTERNATIVE, (B) FOR RELIEF FROM AUTOMATIC STAY [DOC. NO. 20]**

Pender Capital Asset Based Lending Fund I, L.P. (“Movant”) hereby respectfully moves (“Continuance Motion”) this Court for a continuance of the *Status Conference* [Doc. No. 13] (the “Status Conference”) and its *Motion of Pender Capital Asset Based Lending Fund I, L.P. (A) to Dismiss this Chapter 11 Proceeding for Cause; or, in the Alternative, (B) for Relief from Automatic Stay* [Doc. No. 20] (the “Motion to Dismiss”) both currently scheduled in the above-referenced bankruptcy case for Monday, April 15, 2019, at 10:00 AM EDT (the “April 15th Hearings”) to Monday, April 22, 2019, at 10:00 AM EDT or a date thereafter otherwise convenient to the Court. Movant is requesting the continuance as lead counsel for Movant will be out of state on April 15, 2019 and this Court has scheduled Movant’s *Motion of Pender Capital Asset Based Lending Fund I, L.P. for Determination that Debtor California Palms, LLC Bankruptcy Case Is a Single Asset Real Estate Case Pursuant to Bankruptcy Code Section 101(51B)* [Doc No. 21] for April 22, 2019, at 10:00 AM EDT.

The United States Trustee (the “Trustee”) and the Debtor’s proposed counsel, Richard G. Zellers, both indicated at the hearing on March 20 and by email on March 22 that they have no objection to the continuance to April 22, 2019 at 10:00 AM EDT.

WHEREFORE, Movant respectfully requests that this Court enter an order (i) granting the Continuance Motion; (ii) continuing the April 15th Hearings until April 22, 2019 at 10:00 AM EDT or a date thereafter convenient to this Court; and (iii) granting Movant such other and further relief to which they are justly entitled. A proposed order has been submitted to the Court via its e-order upload.

Dated: March 26, 2019

Respectfully submitted,

/s/ Nancy A. Valentine

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and

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*Attorneys for Pender Capital Asset Based
Lending Fund I, L.P.*

CERTIFICATE OF SERVICE

I hereby certify that on March 26, 2019, a true and correct copy of the foregoing *Motion of Pender Capital Asset Based Lending Fund I, L.P. To Continue the April 15, 2019 Hearings on Status Conference [Doc. No. 13] And Its Motion Of Pender Capital Asset Based Lending Fund I, L.P. (A) To Dismiss This Chapter 11 Proceeding For Cause; Or, In The Alternative, (B) For Relief From Automatic Stay [Doc. No. 20]* was served upon the following in the manner indicated:

Via the Court's Electronic Case Filing System:

Sebastian Rucci SebRucci@gmail.com
Ronald A. Spinner spinner@millercanfield.com
United States Trustee (Registered address)@usdoj.gov
Nancy A. Valentine valentin@millercanfield.com, waldroup@millercanfield.com
Tiiara N. A. Patton ust401 ttiara.patton@usdoj.gov
Richard G. Zellers zellersesq@gmail.com

And by First Class, U.S. Mail, postage prepaid, on the following as listed on the Debtor's list of its 20 largest unsecured claims:

Hypercore P.O. Box 840964 Dallas, TX 75284-0964	Law Office of Jeff Kurz 42 N. Phelps Street Youngstown, OH 44503-1130	Vonage Business 3200 Windy Hill Rd, St 200 East Atlanta, GA 30339-5640
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AT&T P.O. Box 5019 Carol Stream, IL 60197-5019	Law Off Robert Schuerger 81 S. 5th Street, Suite 400 Columbus, OH 43215-4323	Ohio Edison 76 S. Main Street Akron, OH 44308-1817
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Youngstown Water Dept. P.O. Box 6219 Youngstown, OH 44501-6219	Dominion Energy P.O. Box 26785 Richmond, VA 23261-6785	Law Office of James Vitullo 5232 Nashua Drive Austintown, OH 44515-5122
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Ohio Bureau of Workers'
Compensation
Legal Division/Bankruptcy
Unit
PO Box 15567
Columbus, OH 43215-0567

/s/ Nancy A. Valentine

Nancy A. Valentine (0069503)

*One of the Attorneys for Pender Capital Asset
Based Lending Fund I, L.P.*

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